

1 JOSEPH P. RUSSONIELLO (CABN 44332)
United States Attorney

2 BRIAN J. STRETCH (CABN 163973)
3 Chief, Criminal Division

4 NATHANAEL M. COUSINS (CABN 177944)
5 Assistant United States Attorney

6 450 Golden Gate Avenue, Box 36055
7 San Francisco, California 94102
8 Telephone: (415) 436-7368
9 Facsimile: (415) 436-7234
10 E-Mail: nat.cousins@usdoj.gov

11 Attorneys for the United States

12
13 UNITED STATES DISTRICT COURT
14
15 NORTHERN DISTRICT OF CALIFORNIA
16
17 SAN FRANCISCO DIVISION

18 UNITED STATES OF AMERICA,) No. CR 08-0574 MHP
19 Plaintiff,)
20 v.)
21 ANGELICA SAGOTE, SEFO SAGOTE,)
22 ELISARA TAITO, and DONNISHA)
23 HARRELL,)
24 Defendants.)
25
26

27 **STIPULATED MOTION TO SET
28 BRIEFING SCHEDULE ON
MOTIONS IN LIMINE AND TO
AMEND DATE FOR PRE-TRIAL
FILINGS; and PROPOSED ORDER**

29
30 *Whereas,*

31 1. Trial in this case is set for March 10, 2009, and the pre-trial conference is
32 set for February 26, 2009.

33 2. Counsel for Angelica Sagote, Brendan Conroy, is currently in trial in state
34 court and proffers that the trial will not be completed until approximately January 30,
35 2009.

36 3. All trial counsel in this case conferred and have agreed to a proposed
37 schedule for motions in limine and pre-trial submissions to the Court.

38
39 STIPULATION
40 CR 08-0574 MHP

4. Counsel are aware that the Court requests pre-trial submissions be made ten days before the pre-trial conference.

The parties jointly move the Court to set deadline for motions in limine and pre-trial filings as follows:

- Motions in limine: February 9, 2009
- Opposition to motions in limine: February 17, 2009
- Reply in support of motions in limine: February 19, 2009
- Pretrial Submissions as set forth in Judge Patel’s “Trial Requirements” Order: February 19, 2009.

Respectfully submitted,

Dated: January 23, 2009

JOSEPH P. RUSSONIELLO
United States Attorney

/s/ Nat Cousins
Assistant United States Attorney

AGREED as of January 23, 2009, by,

/s/ Rita Bosworth
Assistant Federal Public Defender
COUNSEL FOR SEFO SAGOTE

/s/ Brendan Conroy
COUNSEL FOR ANGELICA SAGOTE

/s/ Miranda Kane
COUNSEL FOR DONNISHA HARRELL

* * *

ORDER

For good cause shown upon the stipulated motion of the parties, the proposed deadlines for motions in limine and pre-trial filings are approved.

Date: 1/26/2009

STIPULATION
CR 08-0574 MHP

